

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)**

IN RE:	:	BK. No. 1:19-bk-01432-HWV
HRISOULA STANZOS	:	
Debtor	:	Chapter No.13
	:	
GREENSPRING INVESMENTS, LLC	:	
Movant	:	
	:	
HRISOULA STANZOS	:	
Respondent	:	

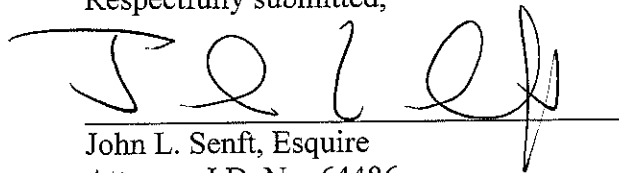
**OBJECTION OF GREENSPRING INVESTMENTS, LLC
TO CONFIRMATION OF THE DEBTOR'S CHAPTER 13 PLAN**

Movant, Greenspring Investments, LLC ("Movant"), hereby objects to confirmation of the Debtor's Chapter 13 Plan as follows:

1. Debtor is the co-owner of the property located at 1738 Filbert Street, York, PA 17404. Movant's claim is secured by a second mortgage on the property.
2. Movant is in the process of drafting and filing a proof claim. The approximate arrears are \$160,000.
3. Debtor's Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
4. Debtor's Plan currently provides for no payment to Movant. Upon information and belief, the value of the property exceeds the amount of the first and second mortgages.
5. Movant objects to Debtor's Plan as it is underfunded. Debtor's Plan should be amended to fully fund the arrears owed to Movant. Confirmation of Debtor's proposed Plan should be denied.

WHEREFORE, Movant respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,



John L. Senft, Esquire
Attorney I.D. No. 64486
Senft Law Firm LLC
105 Leader Heights Road
York, PA 17403
Attorneys for Movant

CERTIFICATE OF SERVICE

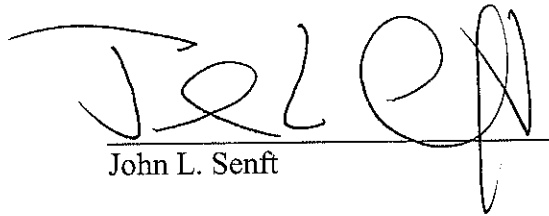
I HEREBY CERTIFY that on this 7 day of May, 2019, I served the foregoing

Objection to Confirmation upon the following parties by U.S. mail, postage prepaid, addressed
as follows:

Charles J. DeHart, Esquire
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Dawn Marie Cutaia, Esquire
115 East Philadelphia Street
York, PA 17401

Hrisoula Stantzos
1965 Normandie Drive
York, PA 17408



John L. Senft